

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

MEMORANDUM

9/17/2020

SUBJECT: Product Chemistry Review for **Vertex CSS-7.5**, EPA Reg. No.: **9616-RA**

FROM: Bruce A Averill *Bruce A. Averill*
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

THRU: Karen P. Hicks, Team Leader
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Antimicrobials Division (7510P)

L. J. O'Dell
for KPH 9/21/2020

TO: Demson Fuller, PM Team 32 / Wanda Henson
Regulatory Management Branch II
Antimicrobials Division (7510P)

Registrant: Vertex
Chemical Corporation
Action code: A531
Agency Due Date:
9/26/2020
DP No.: 458524
Submission No.: 1051678
E-Sub No.: 50163
Classification: EP
Process: Nonintegrated
system
Pesticide type:
Disinfectant

MRID(s): 51143801

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
014703	7681-52-9	Sodium hypochlorite	7.5
		Other Ingredients	92.5
		Total	100%

I. BACKGROUND

On behalf of the Registrant, Vertex Chemical Corporation, Hawkins, Inc., has submitted an application for pesticide registration for their product: Vertex CSS-7.5, EPA Reg. No. 9616-RA. They are seeking approval of a new sodium hypochlorite-based product for use on hard non-porous surfaces.

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-27 – Formulator’s Exemption Statement	<input type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-35 – Data Matrix (5/1/2020)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cover letter (5/1/2020)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed CSF BASIC, (5/1/2020)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label, (5/8/2020)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
REFERENCED: CSF	--	
Comments:		

III. FINDINGS

a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Active Ingredients(s)	Nominal		Upper limit	Lower limit	
Sodium hypochlorite	7.50		9.38	7.13	
	YES		NO	N/A	
1. The certified limits of all ingredients are within 40 CFR standard certified limits.	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
2. Wider certified limits were requested and rationale was accepted.	<input type="checkbox"/>		<input type="checkbox"/>	X	
3. The nominal concentration(s) of the active ingredient is in agreement with the label.	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input type="checkbox"/>		<input type="checkbox"/>	X	
5. All inert ingredients are approved for non-food use pesticide formulations.	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	

6. The impurities present >0.1% are identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

b. Product Label:

	Yes	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. If yes to 1-5, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IV. Additional Findings

The CSF for the basic formulation (dated 5/1/2020) is acceptable. The certified limits for all ingredients agree with 40 CFR §158.350. All ingredients have been cleared for use in pesticide formulations. Percentages on label match composition of product.

V. Conclusion

The registrant has satisfied the CSF requirements for registration of a new basic formulation of EPA Reg. No. **9616-RA**. EPA approves said CSF.

VI. Table A:**Series 830 guidelines – Group A**

OPPTS#	Name	Status	MRID
830.1550	Product Identity & Composition	Acceptable	51143801
830.1600	Description of materials	Acceptable	51143801
830.1620	Description of production process	Acceptable	51143801
830.1650	Description of formulation process	Acceptable	51143801
830.1670	Discussion of formation of impurities	Acceptable	51143801
830.1700	Preliminary analysis	Acceptable	51143801
830.1750	Certified limits	Acceptable	51143801
830.1800	Enforcement analytical method	Acceptable	51143801
830.1900	Submittal of samples	Upon request	Data matrix 5/1/2020

VII. Table B: Series 830 guidelines – Group B

OPPTS#	Name	Study Findings/Comment	Status	MRID
830.6302	Color	Not required for end use product	Acceptable	N/A
830.6303	Physical state	liquid	Acceptable	N/A
830.6304	Odor	Not required for end use product	Acceptable	N/A
830.6313	Stability to normal & elevated temperatures, metals & metal ions	The product is not TGA	Acceptable	N/A
830.6314	Oxidation/Reduction	No oxidizer/reducer present	Acceptable	N/A
830.6315	Flammability	Product is not potentially flammable	Acceptable	N/A
830.6316	Explosibility	Product does not contain explosive ingredients	Acceptable	N/A
830.6317	Storage stability	Not required	Acceptable	N/A
830.6319	Miscibility	Product not mixed with organic solvents	Acceptable	N/A
830.6320	Corrosion characteristics	Not required	Acceptable	N/A
830.6321	Dielectric breakdown voltage	Not required for MUP or TGA	Waived	N/A
830.7000	pH	Not required	Acceptable	N/A
830.7050	UV/Visible absorption	Not required for MUP or EP	Waived	N/A
830.7100	Viscosity	Not required	Acceptable	N/A
830.7200	Melting point	Not required for MUP or EP	Waived	N/A
830.7220	Boiling point	Not required for MUP or EP	Waived	N/A
830.7300	Density/relative	Not required	Acceptable	N/A
830.7370	Dissociation constants in water	Not required for MUP or EP	Waived	N/A
830.7520	Particle size	Not required for MUP or EP	Waived	N/A
830.7550/ 7560/ 7570	Partition coefficient	Not required for MUP or EP	Waived	N/A
830.7840/ 7860	Water solubility	Not required for MUP or EP	Waived	N/A

830.7950	Vapor pressure	Not required for MUP or EP	Waived	N/A
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